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July 19, 2021

BY EMAIL & ECF

Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Delowar Hossain</u> (S1) 19 Cr. 606 (SHS)

Dear Judge Stein:

We write seeking a one-time modification of Delowar Hossain's bail conditions to permit him to celebrate Eid al-Adha, an Islamic holiday that commemorates Abraham's near sacrifice of one of his sons at God's behest. Specifically, we request authorization for Hossain to:

- Leave his home at 4:00 a.m. on Tuesday, July 20, 2021 to attend a religious ritual with his family at a butcher shop located at ;
- Move freely between the addresses of his family-member co-signers the remainder of July 20, 2021, culminating in Hossain spending the night at his Aunt Mariam Khandakar's home; and
- Return to his home no later than 10:00 a.m. on Wednesday, July 21, 2021.

Then, in further observance of the holiday, we request authorization for Hossain to leave his home at 10:00 a.m. and to return by midnight on Thursday, July 22, 2021 to participate in additional family celebrations at one or more of his co-signers' addresses. The addresses of Mr. Hossain's family-member co-signers are pasted below for the Court's convenience:

Mariam Khandakar (co-signer)	Moksha Mahant (co-signer)
Mohamed Chowdhury (co-signer)	MD Abdul Kashem (co-signer)

The Government does not object to the requested modification to permit Hossain's travel to the aforementioned residences in observance of this religious holiday, as long as Hossain travels only to or from the approved co-signer residences on July 20 and 21, 2021 and July 22, 2021. Pre-Trial Services Officer Bernisa Mejia notes that her office has a policy against such modifications for persons on home incarceration like Hossain, but defers to the Court in this case because the modification concerns a religious holiday. Officer Mejia further confirms that Hossain remains in compliance with his release conditions.

Cc:

Government Counsel

Respectfully Submitted,

Amy Galkahio Andrew J. Dalack

Assistant Federal Defenders

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